

### REMARKS

Reconsideration and allowance of the above-reference application are respectfully requested. Claims 1, 16, 23, 38 and 39 are amended, and claims 1-44 are pending in the application.

Claims 1 and 39 stand rejected under 35 USC §112, second paragraph. Claims 1 and 39 have been amended to ensure compliance with §112, second paragraph.

Claims 1-44 stand rejected under 35 USC §102(e) in view of U.S. Patent No. 6,269,336 to Ladd et al. This rejection is respectfully traversed. The following is a comparison between the independent claims and the applied reference.

Each of the independent claims 1, 16, 23, and 38 specify that an output file is generated that describes a voice application. As specified in claims 1 and 23, the attributes describing execution of the XML tags are collected by the application server within an application runtime environment, and at least a portion of the collected attributes are output as an output file for storage on a tangible medium. Claims 16 and 38 specify that the application runtime environment (or means for generating) generates the output file for storage on a tangible medium and that describes selected attributes of the voice application, based on a context collection module storing the determined attributes of the XML tags.

Hence, the collection of these attributes for each XML document enables the application runtime environment to generate an output file that describes the voice application according to a format selected by a user. Hence, a user can request generation of documents that describe the voice application in any format, for example a relationship diagram that identifies interrelated

XML documents and application functions, a user prompt menu to assist users navigating menu options generated by the voice application, a resource utilization table that specifies resources necessary for selected XML documents, and/or a call flow diagram that specifies the sequence of voice application operations.

These and other features are neither disclosed nor suggested in the applied prior art.

Ladd et al. discloses a voice browser 250 that serves as an interactive voice response (IVR) interface for a user: as described in cols. 11-14 (et. seq.) and illustrated in Figures 3, 4 (et. seq.), the voice browser responds to voice inputs from the user or DTMF tones (col. 11, lines 30-34) by generating content requests to navigate to a destination of one or more information sources (preferably using TCP/IP). As illustrated in Figure 4, the voice browser 250 includes a network fetcher 300, a parser unit 302, an interpreter 304, and a state machine 306. The parser unit 302 parses received extensible markup language information and generates a hierarchial structure (see Fig. 7) that is stored in the state machine 306 (col 12, lines 15-27). The interpreter unit 304, connected to the state machine unit 306, “carries out a dialog with the user based upon the tree structure representing a markup language document” and transitions “from state to state ... within a tree structure (i.e., a dialog).” (See col. 13, lines 42-65).

Hence, Ladd et al. relies on a complex voice browser to establish a voice messaging session with a user, and gather content information for execution of interactive voice applications (see col. 13, line 66 to col. 14, line 9).

Ladd et al., however, neither discloses nor suggests generating an output file that describes the voice application, as claimed. Rather, Ladd et al. merely provides a voice browser as an interface for execution of the voice application. However, Ladd et al. neither discloses nor

suggests that the attributes that describe the execution of the application can be supplied to the user, let alone outputting the output file having portions of the collected attributes based on the user selection.

Also note that Ladd et al. neither discloses nor suggests that the output file that describes the voice application is generated for storage on a tangible medium; hence, the independent claims are distinguishable in that the output file is for storage on a tangible medium (e.g., storing as a text file, graphic file, etc. on a tangible medium or printing the document), as opposed to audible playback during a voice application.

Further, col. 13, lines 41-65 merely describe the operations of the interpreter unit 304 and the state machine 306 of the voice browser 250 in executing the current state of the user application, and neither disclose nor suggest generating for storage on a tangible medium an output file that describes the voice application.

Although col. 16, lines 11-19 and col. 17, lines 16-34 describe possible uses of a markup language and execution of the markup language, the cited portions merely specify attributes associated with “defining voice application operations”, as opposed to “attributes describing execution of the XML tags;” there is no disclosure or suggestion that those attributes are used to generate an output file (for storage on a tangible medium) that describes the voice application.

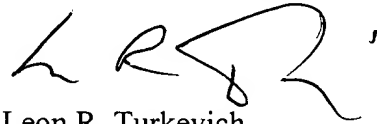
Further, the playing of a menu (“Your choices are coke, pepsi, 7up or root beer”) as described in col. 17, lines 23-24 does not read on the claimed output file because the help text is “played” by a text to speech resource (see col. 9, lines 8-10). Further, Ladd et al. neither discloses nor suggests that the output file is generated based on the user selection of an output format.

Hence, Ladd et al. neither discloses nor suggests generating an output file for storage on a tangible medium and that describes the voice application, based on the user selecting the output format for the output file. For these and other reasons, the §102 rejection should be withdrawn.

In view of the above, it is believed this application is and condition for allowance, and such a Notice is respectfully solicited.

To the extent necessary, Applicant petitions for an extension of time under 37 C.F.R. 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including any missing or insufficient fees under 37 C.F.R. 1.17(a), to Deposit Account No. 50-1130, under Order No. 95-414, and please credit any excess fees to such deposit account.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'L R Turkevich', with a stylized flourish at the end.

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**Date: Monday, August 25, 2003**